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ATTN: Patent Application 10/803,507
United States Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450
phone: 571-272-1804

Dear Mr. Jeanglaude:

As per our phone conversation earlier today, this letter is to respond to your August 12, 2005 office action on which you rejected Claims 1-23 based on the article "A Linear Time, Constant Space Difference Algorithm" by Burns and Long.

Although the parameters M and N in this article denote the sizes of the two files (the source file and target files) as do the parameters m and n in my patent, the parameter K is used differently in this article than in my patent.

This article teaches one to use K space in addition to the space for the source and target files, for a total of $(M+N) + K$ space. That is, the phrase "Constant Space" in the title of this article refers to space *in addition* to $M+N$.

In contrast, all independent claims of my patent require that T can be recovered from S using at most $\text{MAX}\{m,n\}+K$ space where $0 \le K < \text{MIN}\{m,n\}$. So even when K is as large as allowed by my claims ($K = \text{MIN}\{m,n\}-1$), it must be that less than $m+n$ space is used (since the quantity $\text{MAX}\{m,n\}+K$ can be at most $m+n-1$). That is, the phrase "In-Place" in the title of my patent refers to the fact that decoding uses space *less* than $m+n$.

I hope that this explanation suffices for you to allow my claims, please feel free to call or write me with any further questions.

Thank you.

Sincerely,

James A. Storer

(I GOT YOUR PHONE MESSAGE AND TRIED TO CALL YOU; I WILL TRY CALLING AGAIN. HERE IS A COPY OF THE LETTER I SENT YOU IN SEPTEMBER.)